

Exhibit R

Certified Copy

1 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
2 **COUNTY OF LOS ANGELES**

4 **LAOSD ASBESTOS CASES**)
5 **PUI FONG and THAI WONG,**)
6 Plaintiffs,) JCCP Case No. 4674
7 vs.) LASC CASE NO.
8) BC 675449
9 **IMERYS TALC AMERICA, INC.;**)
10 **et al.,**)
11 Defendants.) VOLUME II
12) Pages 170-300

13 **CONTINUATION OF THE TELEPHONIC DEPOSITION OF**
14 **WILLIAM E. LONGO, PH.D.**

15
16 **February 12, 2019**

17 **11:40 a.m.**

18
19 **Suwanee, Georgia**

20
21 **Frances Buono, RPR, CCR-B-791**



1 samples.

2 A typical -- the PLM analysis that we do
3 compared to what's normally done, our analyst spends
4 up to about two hours per sample. But I have many
5 times gone back and looked at findings and looked on
6 the monitor and looked through the microscope and, of
7 course, I have reviewed every scrap of data that was
8 generated and concur with my analysts.

9 But, no, I have not sat down and taken a
10 sample and started and then gone through the whole
11 sample and finished and said well, this is my opinion
12 what's in here, or it's nondetect.

13 Q. And that's true for both PLM and TEM;
14 correct?

15 A. That is true.

16 Q. Was Paul Hess the only analyst who
17 performed PLM analysis for your laboratory?

18 A. No, we have one, two, three, four people
19 here who can do -- or are trained and certified to do
20 PLM analysis.

21 Q. Let me be more specific. Was Paul Hess
22 the only analyst who did the PLM work for the samples
23 that are discussed in Exhibit 15?

24 A. Yes.

25 Q. What is his background?

1 A. He has a degree in geology. He has been
2 doing this type of analysis for 30 years. He was
3 trained, I think at McCrone, way back when. And he
4 has the patience to analyze at the PLM level that
5 takes long periods of time. This is not your
6 standard PLM analysis that somebody may do for an
7 asbestos-containing bulk sample. It --

8 Q. Why does it take so much longer to analyze
9 talc for asbestos using PLM than a typical
10 asbestos-containing material?

11 A. Well, it doesn't have to take that long,
12 and I think the results show it. You don't find
13 anything. Because you're at these trace levels, you
14 have to make sure you cover the entire area.

15 Paul looks at approximately
16 950 millimeters squared area. And you have to be
17 able to spend the time.

18 And in addition to him doing that,
19 spending the time, we have a high definition camera
20 set up on the polarized light microscope connected to
21 a high definition monitor so that when Mr. Hess finds
22 a potential amphibole structure, he can then look at
23 it on the monitor so that he can do fine focus. And
24 also we have a special objective lens that's a plane
25 objective lens that flattens the -- gives you a

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1 C E R T I F I C A T E
2

3 STATE OF GEORGIA:

4 COUNTY OF HALL:

5
6 I hereby certify that the foregoing
7 transcript was taken down, as stated in the
8 caption, and the questions and answers thereto
9 were reduced to typewriting under my direction;
10 that the foregoing pages 170 through 296
11 represent a true, complete, and correct
12 transcript of the evidence given upon said
13 hearing, and I further certify that I am not of
14 kin or counsel to the parties in the case; am
15 not in the regular employ of counsel for any of
16 said parties; nor am I in anywise interested in
17 the result of said case.

18 This, the 14th day of February, 2019.

19
20 
21 FRANCES BUONO, B-791
22 Georgia Certified Court Reporter
23
24
25